Michigan Refining Division

Marathon Petroleum Company LP

1300 South Fort Street
Detroit, MI 48217
Tel: 313.843.9100

VIA FED EX GROUND

January 5, 2016

Chief Environmental Enforcement Section
Environmental & Natural Resources Division
U.S. Department of Justice
ENRD Mailroom, Room 2121
601 D. Street, NW
Washington, DC 20004

Director, Air Enforcement Division
U.S. Environmental Protection Agency
c/o Matrix New World Engineering, Inc.
26 Columbia Turnpike
Florham Park, NJ 07932

Air and Radiation Division
U.S. EPA, Region 5
77 West Jackson Blvd. (AE-17J)
Chicago, IL 60604
Attn: Compliance Tracker

MDEQ – Air Quality Division
Cadillac Place, Suite 2-300
3058 West Grand Boulevard
Detroit, MI 48202
Attn: Ms. Wilhemina McLemore

RECEIVED
JAN 12 2016
AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5

Office of Regional Counsel
U.S. EPA, Region
77 West Jackson Blvd. (C-14J)
Chicago, IL 60604

RE: Reportable Incident Report – Final Corrective Action
Marathon Petroleum Company LP, Detroit, MI
MPC Incidents INC-42330, -42360 and -42392; March 12, 2012

To Whom It May Concern:

Pursuant to Paragraph 21(E) of the November 2005 First Revised Consent Decree, United States of America et. al. v. Marathon Ashland Petroleum LLC (presently known as Marathon Petroleum Company LP "MPC") (Civil Action No. 4:01CV-40119-PVG), as amended by the First Modification on March 31, 2008, the Second Modification on June 30, 2010, and the Third Modification on November 1, 2012, please be advised that a reportable tail gas incident occurred on March 12, 2012. In accordance with the requirements of the above referenced paragraph, a table containing the finalized corrective actions is attached. If you have any questions regarding this incident, please contact Honor Sheard at (313) 297-6248.

Sincerely,

Marathon Petroleum Company LP
By: MPC Investment LLC, General Partner

Mr. David Roland, Deputy Assistant Secretary

Recommendation	Commenced	Due Date	Completion Date	Closure Comments
Investigate Preventive Maintenance or replacement of Sult Traps in the short term.	4/26/2012	5/31/2012	5/29/2012	One work order for each sulfur train was written and activated for the operator to remove and inspect the basket and float for all three Sultraps per train twice per year. The Sultrap internals will be replaced if necessary. Inspection to look at Sultrap piping once the internals are removed. Sulfur Train A - WO 4204969, Sulfur Train B - WO 4204970, Sulfur Train C - WO 4204971
Investigate the proper exchanger monitoring frequency based on changing plant conditions	4/26/2012	8/31/2012	8/12/2012	The cooling tower exchangers are currently being monitored on a more frequent interval that began in May of 2012. This includes monthly temperature surveys, biannual flow studies, and continuous approach temperature monitoring.
Investigate and correct the issues with the SRU A Acid Gas Flow Meter and SRU A Tailgas Analyzer.	4/26/2012	SRU A – 4/30/2012 SRU B – 11/15/2012	10/26/2012	Acid gas lines were cleaned during the 2012 SRU A outage. The A train analyzer was replaced during the 2012 SRU A outage. SRU B analyzer was replaced during the fall shutdown.
Investigate providing a curve for vent valve position versus air flow to provide guidance for filter change-out.	4/26/2012	9/28/2012	9/23/2012	The vent valve is for surge protection and does not indicate plugging filters. The blowers have filter differential indication. flow. The position of the valve does not indicate anything about the health of the filter. There are existing indicators on the 42C1 A/B/C blowers to show when the filters are plugged. The vent valve is for surge protection and does not indicate plugging filters. The blowers have filter differential indication.
Investigate amine monitoring frequency and testing based on changing plant conditions.	4/26/2012	8/31/2012	8/12/2012	Amine monitoring has been reviewed and updates to the operating envelope and Lab targets have been made to get better determination on targets. The current sampling has been reviewed with technologist and determine that current sampling time frame is aligned with industry standards. Projects have been put together for the non-critical sample found during the review.
Consider installing a vortex breaker on TK 51 and TK 52.	4/26/2012	Tk. 51 – 7/1/2012 Tk. 52 – Next out of service date.	7/2/2012	Vortex breaker was installed on suction nozzle.

Investigate routing Sulfur Pit Vapors from the Incinerator to the front of the SRUs.	4/26/2012	12/31/2015	12/18/2015	A project investigated the potential scope of rerouting the Complex 2 Sulfur Recovery Unit pit vapors to the front of the trains for reprocessing. This would allow the sulfur compounds in the pit vapors to be converted to elemental sulfur product instead of being released as sulfur dioxide emissions from the incinerator. The estimated reduction from the project would be approximately 5-15 tons of sulfur dioxide per year. Based on input from MRD's air permitting consultant, regulatory agencies consider $10,000-$12,000 per ton to be a cost-effectiveness threshold for SO2 BACT. The project did not warrant enough justification on a cost/ton basis at $156,000/ton. The refining management staff decided to cancel the project based on the cost/ton basis along with that the PMO and NSR Consent Decree do not require this project to be completed. The project information will be kept and could be used in the future for reductions if they are necessary. The DSP is attached to this item for reference.
Evaluate the HAZOP Scenario and Alarm rationalization basis for the GOHT Stripper Seam Generator high level alarm.	4/26/2012	2/1/2014	1/21/2014	A PVHH alarm at 95% was added on 1/21/14, per MOC M2014254-001.
Consider investigation of the BFW control valve on the Steam Generator	4/26/2012	6/30/2013	6/30/2013	All steam generators have high level alarms that would provide operator notification during an upset that the controls are not keeping up. In that case, the operator should manually take control and close the valve if necessary.
Investigate the issues with the Triconics and Honeywell logic and graphics start-up interface	4/26/2012	6/30/2013	6/30/2013	The SO2 and 12hr SO2 tags have Urgent priority alarms at 250ppm that will notify the operator of high SO2. The instantaneous SO2 tag has an earlier Low priority alarm at 150. These tags are on several graphics including Incinerator L2&L3, CEMS L3, SRU L2 and the L3's of every train.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name: Marathon Petroleum Company LP | County: Wayne

Source Address: 1300 South Fort Street | City: Detroit

AQD Source ID (SRN): A9831 | ROP No.: MI-ROP-A9831-2012b | ROP Section No.: 01

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 1/5/2016 To 1/5/2016

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

MPC Incident INC-42330, -42360, -42392; March 12, 2012

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

David Roland
Name of Responsible Official (print or type)

MPC Investment LLC,
its General Partner
Deputy Assistant Secretary
Title

313-843-9100
Phone Number

Signature of Responsible Official

1/7/2016
Date

* Photocopy this form as needed.

EQP 5736 (Rev 2-10)